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December 6, 2021

VIA ECF

Honorable Jesse M. Furman
United States District Judge
United States District Court
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

Re: Frank Rodriguez v. City of New York
21 cv-4255 (JMF)

Honorable Sir:

We represent plaintiff in the captioned action and provide the following joint status report with Michael Finkelstein, Esq. of the New York City Law Department, attorneys for defendant. The Court has scheduled a pretrial conference for January 5, 2022 at 4:15 p.m. The parties jointly request the Court adjourn the conference until sometime after the settlement conference in this matter scheduled before the Honorable Sarah Netburn on January 13, 2022.

Fact discovery is scheduled to conclude on December 30, 2021 and expert discovery on February 4, 2022. The parties are working diligently to complete discovery and advance settlement. Plaintiff has made a settlement demand and expects to receive a settlement offer prior to the conference scheduled before Judge Netburn.

There are no outstanding motions and none are anticipated.

In the event the parties are unsuccessful in resolving this matter, it is respectfully requested fact discovery be extended to February 15, 2022 and expert discovery extended until March 30, 2022.

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The parties have not made prior requests for extensions of time to complete discovery.
We thank the Court for its kind consideration.

Respectfully,

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By: */s/ Michael Finkelstein*

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BDF:kk

Application GRANTED. The pretrial conference is hereby ADJOURNED to **January 26, 2022, at 3:45 p.m.** If the parties are unable to reach agreement after the settlement conference, they shall promptly file any requests to extend the discovery deadlines. The Clerk of Court is directed to terminate ECF No. 18.

SO ORDERED.



December 6, 2021